

# EXHIBIT W

Barbara Brown

10/11/2006

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UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CERTIFIED ORIGINAL  
LEGALINK BOSTON

-----x

IAN BROWN, JAMES BROWN and  
BARBARA BROWN,

Plaintiffs,

-against- Civil Action  
No. 04civ1192-RGS

UNITED STATES OF AMERICA, VERIZON  
NEW ENGLAND, INC., and BOSTON  
EDISON COMPANY d/b/a NSTAR ELECTRIC,

Defendants.

-----x

October 11, 2006  
9:48 a.m.

Deposition of BARBARA BROWN, taken by the  
Defendants, pursuant to notice, held at  
Manheimer & Charnas LLP, 747 Third Avenue,  
New York, New York, before Tracy Eckhoff, a  
Shorthand Reporter and Notary Public within and  
for the State of New York.

1 BARBARA BROWN

2 Q. Or his utility bills or insurance?

3 A. No.

4 Q. So before his accident, you didn't  
5 provide any financial support to Ian?

6 A. No.

7 Q. Now, after the accident -- I'm sure  
8 the accident had -- well, changed your  
9 relationship with Ian to some extent. And can you  
10 just talk a little bit about how the relationship  
11 changed after the accident.

12 A. Upon Ian's injury, my role had been  
13 mom. From the date of his injury throughout the  
14 next half year or more, I became caregiver,  
15 cheerleader, punching bag, family litigator, roles  
16 I never envisioned for myself, but Ian helped me  
17 become a better, stronger version of myself.

18 Q. Do you think the accident brought you  
19 and Ian closer together?

20 A. I do.

21 Q. We sat with Ian for almost two days,  
22 and he's like one of the most positive people I've  
23 ever seen. We deposed Ms. Gagne and we learned a  
24 little bit more about Ian and who he is. I'm  
25 wondering if you'd talk a little bit about a side

1 BARBARA BROWN

2 Okay.

3 And he's really fine, but those are  
4 the physical types of assistance that I'm able to  
5 give him.

6 **Q. Do you consider Ian to be emotionally**  
7 **dependent on you?**

8 A. No.

9 **Q. Now, I believe that -- do you know**  
10 **how much Ian receives from the federal government**  
11 **every month?**

12 A. I do not.

13 **Q. Do you know how much approximately he**  
14 **receives?**

15 A. I do not.

16 **Q. Does Ian contribute to the household**  
17 **expenses?**

18 A. He does.

19 **Q. In what way does he contribute to the**  
20 **household expenses?**

21 A. He contributes towards a  
22 budget-planned electrical bill, budget-planned gas  
23 bill, and he purchases the food at the commissary  
24 for us, for the household.

25 **Q. Does he pay the entire gas and**

**BARBARA BROWN**

**electric bill?**

A. He does.

**Q. And he pays for all the food?**

A. He does. He pays for the majority of the food.

**Q. Do you give Ian an allowance of any sort?**

A. No.

**Q. Do you pay for Ian's school?**

A. Excuse me?

**Q. Do you pay for his school? I'm sorry.**

A. No.

**Q. How about Ian's clothing?**

A. Gifts occasionally, you know. He's a clothes horse.

**Q. But he generally buys his own clothes?**

A. He does. He does.

**Q. So Ian is not financially dependent on you?**

A. No.

**Q. Do you know if Ian has been exploring living on his own?**

**BARBARA BROWN**

A. I'm sorry, Josh. Again.

**Q. Sorry.**

**Do you know if Ian has been exploring living on his own outside of your house?**

A. I do not know.

**Q. Did you receive any money -- or did Ian contribute any money for the modifications you made to your home?**

A. No.

**Q. Are you aware that Ian at one point in his lifetime will have provided to him by the federal government the expense necessary to retrofit a residence for him?**

A. The question again, Josh. I'm sorry.

**Q. It was terrible.**

A. No. No.

**Q. Are you aware that the federal government will provide to Ian the expenses necessary to retrofit a residence for him?**

A. For Ian?

**Q. Yes.**

A. I believe so.

**Q. Do you know if Ian has any plans to take advantage of that?**

BARBARA BROWN

MS. JOHNSON: Thank you.

THE WITNESS: You're welcome.

MR. CHARNAS: Two minutes is all I  
need.

(A recess was taken.)

EXAMINATION BY MR. CHARNAS:

**Q. Mrs. Brown, how much in total,  
approximately, does Ian contribute on a monthly  
basis to the household?**

A. My best guess estimate would probably  
be between about 550 and maybe 650 dollars.

**Q. Per month?**

A. Per month.

**Q. Did Ian ever reimburse you for the  
expenses of improving the house and property to  
make it more handicap accessible?**

A. No.

**Q. Do you have a land-line telephone in  
your house?**

A. I do.

**Q. Does Ian ever use that telephone?**

A. Yes.

**Q. Does Ian pay for that telephone?**

A. No.

1 BARBARA BROWN

2 Q. Did you ever buy Ian food for use in  
3 the house, food and beverages?

4 A. Sure. Yes.

5 Q. Tell us a little bit about that.

6 A. On the occasion I'm going to the  
7 grocery store or some of the wholesale clubs that  
8 are by us, I'll always ask him if there's anything  
9 that he needs. An example is Ian has a proclivity  
10 at the moment for Red Bull, an energy drink. I  
11 understand most medical students take this. I'll  
12 pick that up for him while I'm out there. Times  
13 there are ain't bacterial wipes that he'll need or  
14 just favors. What I meant was just could you pick  
15 this up, you're going to the store.

16 Q. When you buy these things for him,  
17 does he reimburse you?

18 A. No. I don't ask for reimbursement.

19 Q. Does Ian ever go out to eat with you  
20 and the family?

21 A. Yes.

22 Q. How much has that happened,  
23 approximately?

24 A. I'd say probably once every couple of  
25 months.



1 BARBARA BROWN

2 Q. Who picks up the tab for that  
3 generally?

4 A. Most of the time it's my husband and  
5 myself.

6 MR. CHARNAS: That's all I have.

7 Thank you.

8 FURTHER EXAMINATION BY MR. LEWIN:

9 Q. Just a few follow-ups, Mrs. Brown.

10 If Ian didn't live in the house,  
11 would you still have your land-line phone?

12 A. Yes.

13 Q. And I apologize if I've asked you  
14 this already. Do you know how much Ian gets paid  
15 per month by the government?

16 A. I don't. I'm sorry.

17 Q. When you said that sometimes you'll  
18 pick up some food for Ian when you're out, is  
19 that -- is Ian dependent on you to buy that food  
20 for him?

21 A. No.

22 Q. So he could buy that on his own?

23 A. Yes, he could.

24 Q. And you mentioned as an example, I  
25 believe, that you pick up some ain't bacterial

**BARBARA BROWN**

wipes for him as well. Is that the same thing, he could buy them on his own; you're just doing that as a favor?

A. He could.

Q. And does Ian pay sometimes when you do go out to dinner with him?

A. Yes.

Q. So when you pay, it's not a matter of Ian being dependent on you to buy him food?

A. That's correct.

Q. So Ian is financially independent of you; isn't that correct?

(Continued on next page.)